

III. REMARKS

Claims 1-20 are pending in this application. By this amendment, claims 1 and 19 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-9 and 19-20 are rejected under 35 U.S.C. 101 as allegedly being directed to non-statutory subject matter. Applicants have amended claim 1 to recite "a processor, and a memory, the memory including..." and have amended claim 19 to recite "a program product stored on a computer readable storage medium." Applicants submit that the claimed invention is directed to statutory subject matter. Accordingly, Applicants request that the rejection be withdrawn.

In the Office Action, claims 1, 10 and 19 are rejected under 35 U.S.C. 112, first paragraph, as allegedly failing to comply with the written description requirement. Further, the Office objects to the amendment filed March 28, 2007 under 35 U.S.C. 132(a) because it allegedly introduces new matter into the disclosure. The Office requests that Applicants point out the support for the newly added limitation "...without intercepting the application at run-time" in the specification. In response, Applicants state that there are multiple instances in the specification where the claimed invention is compared to Halviatti's '843 patent, and it is reiterated several times that while the '843 patent requires interception of the running application to achieve its goals, the claimed invention does not. Specifically, Applicants point to at least paragraphs [0067] and [0072] of the specification for support for this language in the claims. For

example, paragraph [0067] states that one advantage of the claimed invention is its “non interception methodology when compared with the prior art U.S. patent no. 5,475,843.” Further, paragraph [0072] states “the prior art patent’s solution solves a similar class of problem to that of the novel scheme above, but in a way which encourages interference and interception of the running application. In contrast, the novel scheme described above protects the application’s natural run-time execution.” Accordingly, Applicants submit that there is adequate support in the specification for the amendment and requests that the Office’s objection to the specification and rejection of claims 1, 10 and 19 be withdrawn.

In the Office Action, claims 1-6, 8-15 and 17-20 are rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Halviatti et al. (U.S. Pat. No. 5,475,843), hereinafter “Halviatti.” Reconsideration in view of the following remarks is respectfully requested.

With respect to claims 1, 10 and 19, Applicants submit that Halviatti fails to disclose each and every element of the claims, including script translation means for intercepting a call from the automation script to a function simulating a user action on the application without intercepting the application at run-time. (See claim 1, and as similarly recited by claims 10 and 19). The Office argues that the system of Halviatti does not intercept the application at run-time. Applicants respectfully disagree. Interpreting Halviatti only for purposes of this response, Applicants submit that Halviatti relies on the specific interception of the running application to achieve its goals, including the need to write ATUs (Application Translation Units), which are not necessary in the claimed invention. *See e.g.:*

...the target application is registered with the Message Engine 350. In particular, hooks are installed by a corresponding ATU 340 so that events within the target application of interest are trapped.

Halviatti, Col. 10, lines 43-47. Halviatti further teaches that each event is trapped for processing by an ATU. Col. 10, lines 55-57. This level of interception is intrusive and compromises the execution of the application at run-time. While the claimed invention protects the application's run-time execution, Halviatti specifically relies on interference during run-time.

Furthermore, with respect to claims 2, 11 and 20, Applicants submit that Halviatti fails to disclose, *inter alia*, selective text locator means coupled to the message translation means for selectively supplying appropriately translated text to the automation script's run time execution depending on the function call in a case that a same text string is translated differently based on context. In support of its rejection, the Office asserts that "'the Script Engine identifies the event by mapping the message into its set of known reserved words according to the instructions of the script...upon completion of this step, the method has successfully dispatched the meta-message with appropriate actions being effected in response to that message.' Col. 17, lines 44-51." The Office also asserts that Halviatti discloses "'ATM above can represent different language versions of the Confirmation dialog without any modification. Col. 30, lines 13-15.'" In response, Applicants submit that a general call to translate a message in a Windows environment is not equivalent to selecting an accurate text translation from a plurality of available translations. In the present invention, the selective text locator ensures that during a search the correct translation is returned based on the type of control the textual object belongs to. The general translation call in Halviatti however, fails to disclose this claimed feature. Accordingly, Applicants submit that Halviatti fails to disclose each and every element of the claimed invention and respectfully request withdrawal of the rejection.

With respect to all other dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Each

dependent claim is believed to be allowable based on the above arguments, as well as for their own additional features.

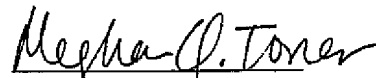
In the Office Action, claims 7 and 16 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Halviatti, in view of Laane (U.S. Pat. No. 6,978,445). Applicants herein incorporate the arguments presented above with respect to the independent claim from which the claims depend. Claims 7 and 16 are believed to be allowable based on the above arguments, as well as for their own features.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



Meghan Q. Toner

Reg. No.: 52,142

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Hoffman, Warnick & D'Alessandro LLC
75 State Street 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)

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